

CRIMINAL COMPLAINT

United States District Court		DISTRICT of ARIZONA	
United States of America		DOCKET NO.	
v.		MAGISTRATE'S CASE NO.	19-02133MJ
John J. Russo; DOB: 1960; United States			
Complaint for violation of Title 8, United States Code §§ 1324(a)(1)(A)(ii) & 1324(a)(1)(B)(i); 1325; 18 USC § 2			
COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:			
<p>COUNT 1 (Felony) On or about July 10, 2019 at or near Hereford, in the District of Arizona, John J. Russo, knowing or in reckless disregard that certain aliens, namely Mario Gonzalez-Alvarez, Ismael Sandoval-Ordonez, and Rogelio Munoz-Meza, had come to, entered, and remained in the United States in violation of law, did transport said aliens within the United States by means of transportation and otherwise, in furtherance of such violation of law and did so for the purpose of private financial gain; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and 1324(a)(1)(B)(i).</p> <p>COUNT 2 (Misdemeanor) On or about July 10, 2019 at or near Hereford, in the District of Arizona, John J. Russo, did unlawfully aid and abet certain illegal aliens, namely Mario Gonzalez-Alvarez, Ismael Sandoval-Ordonez, and Rogelio Munoz-Meza, to elude examination and inspection by Immigration Officers of the United States of America; in violation of Title 8, United States Code, Section 1325 and Title 18, United States Code, Section 2.</p>			
BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:			
<p>On or about July 10, 2019 at or near Hereford, in the District of Arizona, United States Border Patrol Agents (BPA) observed a white Honda Accord bearing a temporary license plate parked at the Knights Inn in Sierra Vista, AZ. In the past month, BP has received intelligence that the Knights Inn has seen increasing alien smuggling activity. Load drivers will stash aliens at the hotel until the State Route 90 checkpoint temporarily closes. The same white Honda Accord, which is registered in Chandler, AZ, was seen at this hotel less than two weeks ago. BPA observed the driver, later identified as John J. Russo, leave the hotel in the Accord alone and began surveillance on the vehicle. Twice the driver pulled off on the shoulder and turned on the hazard lights. The driver then made a U-Turn when he passed the BPA, the agent could see there were now multiple people in the vehicle. The BPA also received a citizen's report over the service radio that there was a white Honda Accord loading illegal aliens near State Route 92. The agent conducted a vehicle stop. When asked about the people in the back, the driver replied, "I'm just giving them a ride." One of the passengers was wearing camouflage clothing. BPA determined all four passengers, including Mario Gonzalez-Alvarez, Ismael Sandoval-Ordonez, and Rogelio Munoz-Meza, were citizens of Mexico, in the United States illegally.</p> <p>Material witnesses Mario Gonzalez-Alvarez, Ismael Sandoval-Ordonez, and Rogelio Munoz-Meza stated they had made arrangements to be smuggled into the United States for money. The material witnesses stated that after crossing into the United States illegally, they were guided to the highway and were told to wait for a load vehicle. When the white car arrived, their guide told them that was their ride, and they came out of the brush and got into the car.</p>			
MATERIAL WITNESSES IN RELATION TO THE CHARGE: Mario Gonzalez-Alvarez, Ismael Sandoval-Ordonez, and Rogelio Munoz-Meza			
DETENTION REQUESTED		SIGNATURE OF COMPLAINANT	
COMPLAINT REVIEWED by AUSA CHR/lmw			
Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.		OFFICIAL TITLE & NAME: U.S. Border Patrol Agent	
Sworn to before me and subscribed in my presence.			
SIGNATURE OF MAGISTRATE JUDGE ¹⁾		DATE	
		July 11, 2019	

1) See Federal rules of Criminal Procedure Rules 3 and 54